

Medicaid Autism Services- Legislative Cost Report

(FY2022 Appropriation Act - Public Act 87 of 2021)

March 1, 2022

Sec. 960. (1) *From the funds appropriated in part 1 for autism services, the department shall continue to cover all Medicaid autism services to Medicaid enrollees eligible for the services that were covered on January 1, 2019.*

(2) *To restrain cost increases in the autism services line item, the department shall do all of the following:*

(a) *By March 1 of the current fiscal year, develop and implement specific written guidance for standardization of Medicaid PIHPs and CMHSPs autism spectrum disorder administrative services, including, but not limited to, reporting requirements, coding, and reciprocity of credentialing and training between PIHPs and CMHSPs to reduce administrative duplication at the PIHP, CMHSP, and service provider levels.*

(b) *Require consultation with the client's evaluation diagnostician and PIHP to approve the client's ongoing therapy for 3 years, unless the client's evaluation diagnostician recommended an evaluation before the 3 years or if a clinician on the treatment team recommended an evaluation for the client before the third year.*

(c) *Limit the authority to perform a diagnostic evaluation for Medicaid autism services to qualified licensed practitioners. Qualified licensed practitioners are limited to the following:*

(i) *A physician with a specialty in psychiatry or neurology.*

(ii) *A physician with a subspecialty in developmental pediatrics, development-behavioral pediatrics, or a related discipline.*

(iii) *A physician with a specialty in pediatrics or other appropriate specialty with training, experience, or expertise in autism spectrum disorders or behavioral health.*

(iv) *A psychologist with a specialty in clinical child psychology, behavioral and cognitive psychology, or clinical neuropsychology, or other appropriate specialty with training, experience, or expertise in autism spectrum disorders or behavioral health.*

(v) *A clinical social worker with at least 1 year of experience working within his or her scope of practice who is qualified and experienced in diagnosing autism spectrum disorders.*

(vi) *An advanced practice registered nurse with training, experience, or expertise in autism spectrum disorders or behavioral health.*

(vii) *A physician's assistant with training, experience, or expertise in autism spectrum disorders or behavioral health.*

(d) *Require that a client whose initial diagnosis was performed by a diagnostician with master's level credentials have their diagnosis and treatment recommendations reviewed by a physician, psychiatric nurse practitioner, physician's assistant with training, experience, or expertise in autism spectrum disorders or behavioral health, or fully credentialed psychologist.*

(e) Allow and expand the utilization of telemedicine and telepsychiatry to increase access to diagnostic evaluation services.

(f) Coordinate with the department of insurance and financial services on oversight for compliance with the Paul Wellstone and Pete Domenici mental health parity and addiction equity act of 2008, Public Law 110-343, as it relates to autism spectrum disorder services, to ensure appropriate cost sharing between public and private payers.

(g) Require that Medicaid eligibility be confirmed through prior evaluations conducted by physicians, psychiatric nurse practitioners, physician's assistant with training, experience, or expertise in autism spectrum disorders or behavioral health, or fully credentialed psychologists to the extent possible.

(h) Maintain regular statewide provider trainings on autism spectrum disorder standard clinical best practice guidelines for treatment and diagnostic services.

(3) By March 1 of the current fiscal year, the department shall report to the senate and house appropriations subcommittees on the department budget, the senate and house fiscal agencies, the senate and house policy offices, and the state budget office on total autism services spending broken down by PIHP and CMHSP for the previous fiscal year and current fiscal year and total administrative costs broken down by PIHP, CMHSP, and the type of administrative cost for the previous fiscal year and current fiscal year.



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Overview

Pursuant of Section 1905(r) of the Social Security Act, Michigan is required to ensure access to [Early and Periodic Screening, Diagnostic, and Treatment \(EPSDT\) services](#) for all eligible infants, children and adolescents under the age of 21. This includes children enrolled in Medicaid with Autism Spectrum Disorder (ASD)¹, a developmental disability that can cause significant social, communication and behavioral challenges.² Michigan Medicaid covers Behavioral Health Treatment (BHT), including Applied Behavior Analysis (ABA) services, which is recognized as the most effective treatment for children, adolescents, and adults with ASD, in accordance with the State's shared responsibility to implement the EPSDT benefit along with the Centers for Medicare & Medicaid Services (CMS). The goal of EPSDT is to assure early detection and care as soon as possible to address health problems before they become advanced, and treatments are more difficult and costlier to manage.³ Section 960 of PA 87 of 2021 requires the Michigan Department of Health and Human Services (MDHHS) to continue to cover all Medicaid autism services to eligible enrollees, restrain cost increases in the autism service line item and report on total autism services spending for the previous and current fiscal year and total administrative costs broken down by Prepaid Inpatient Health Plan (PIHP) and Community Mental Health Services Programs (CMHSP) for the previous and current fiscal year.

As commissioned by Section 960 please see the Medicaid Actuarial⁴ summary tables below for the total autism spending and total administrative costs, noting type⁵, for the previous fiscal year and current fiscal year broken down by PIHP and CMHSP county.

¹ CMS, CMCS Informational Bulletin (July 7, 2014), Clarification of Medicaid Coverage of Services to Children with Autism. Retrieved from <https://www.medicaid.gov/Federal-Policy-Guidance/Downloads/CIB-07-07-14.pdf>

² CDC, Autism Spectrum Disorder (ASD). Retrieved from <https://www.cdc.gov/ncbddd/autism/facts.html>

³ CMS, State Medicaid Manual §§ 5010, 5121, 5310 (requiring states to "[a]ssure that health problems found are diagnosed and treated early, before they become more complex and their treatment more costly, . . . that informing methods are effective, . . . [and] that services covered under Medicaid are available.")

⁴ MDHHS, MSA Medicaid Actuarial data extract 02/07/2022

⁵ MDHHS, MSA Medicaid Actuarial defined admin types, 1) Total Overall Costs = Base Cost + Variable ASD Admin + Fixed Admin, 2) Total Admin Costs = Variable ASD Admin

Table 1: FY21 Costs by PIHP

PIHP Name	Overall Costs	Admin Costs
CMH Partnership of Southeast Michigan	\$ 15,176,514	\$ 683,768
Detroit Wayne Integrated Health Network	\$ 79,537,152	\$ 3,583,307
Lakeshore Regional Entity	\$ 37,005,351	\$ 1,667,655
Macomb County CMH Services	\$ 21,982,376	\$ 990,295
Mid-State Health Network	\$ 52,557,740	\$ 2,367,563
NorthCare Network	\$ 6,616,059	\$ 298,009
Northern Michigan Regional Entity	\$ 15,549,086	\$ 700,420
Oakland Community Health Network	\$ 23,884,713	\$ 1,075,912
Region 10 PIHP	\$ 27,555,815	\$ 1,241,498
Southwest Michigan Behavioral Health	\$ 25,115,969	\$ 1,131,567
Grand Total	\$ 304,980,777	\$ 13,739,993

Table 2: FY22 Costs by PIHP⁶

PIHP Name	Overall Costs	Admin Costs
CMH Partnership of Southeast Michigan	\$ 4,643,797	\$ 208,381
Detroit Wayne Integrated Health Network	\$ 23,818,824	\$ 1,068,187
Lakeshore Regional Entity	\$ 11,378,413	\$ 510,692
Macomb County CMH Services	\$ 6,617,588	\$ 296,753
Mid-State Health Network	\$ 16,001,602	\$ 718,077
NorthCare Network	\$ 1,963,458	\$ 88,085
Northern Michigan Regional Entity	\$ 4,725,997	\$ 212,066
Oakland Community Health Network	\$ 7,325,860	\$ 328,790
Region 10 PIHP	\$ 8,394,830	\$ 376,715
Southwest Michigan Behavioral Health	\$ 7,612,457	\$ 341,468
Grand Total	\$ 92,482,826	\$ 4,149,214

⁶ FY22 costs reflect the data for the current fiscal year October 1, 2021, through January 31, 2022

Table 3: FY21 Costs by County

County	Overall Costs	Admin Costs
ALCONA	\$ 349,495	\$ 15,734
ALGER	\$ 180,562	\$ 8,127
ALLEGAN	\$ 3,023,603	\$ 136,261
ALPENA	\$ 1,096,389	\$ 49,359
ANTRIM	\$ 617,254	\$ 27,815
ARENAC	\$ 564,203	\$ 25,406
BARAGA	\$ 174,103	\$ 7,851
BARRY	\$ 1,223,124	\$ 55,113
BAY	\$ 3,416,735	\$ 153,864
BENZIE	\$ 444,162	\$ 20,013
BERRIEN	\$ 4,829,123	\$ 217,559
BRANCH	\$ 1,318,729	\$ 59,435
CALHOUN	\$ 4,875,815	\$ 219,624
CASS	\$ 1,394,157	\$ 62,833
CHARLEVOIX	\$ 589,585	\$ 26,573
CHEBOYGAN	\$ 893,080	\$ 40,227
CHIPPEWA	\$ 771,187	\$ 34,755
CLARE	\$ 1,366,754	\$ 61,543
CLINTON	\$ 1,243,719	\$ 56,043
CRAWFORD	\$ 539,026	\$ 24,272
DELTA	\$ 919,418	\$ 41,403
DICKINSON	\$ 580,436	\$ 26,141
EATON	\$ 2,384,798	\$ 107,450
EMMET	\$ 679,808	\$ 30,648
GENESEE	\$ 19,242,292	\$ 866,916
GLADWIN	\$ 909,197	\$ 40,929
GOGEBIC	\$ 451,312	\$ 20,317
GRAND TRAVERSE	\$ 1,952,422	\$ 87,986
GRATIOT	\$ 1,312,761	\$ 59,148
HILLSDALE	\$ 1,606,863	\$ 72,394
HOUGHTON	\$ 721,847	\$ 32,537
HURON	\$ 845,819	\$ 38,086
INGHAM	\$ 8,678,392	\$ 390,980
IONIA	\$ 1,717,300	\$ 77,375
IOSCO	\$ 958,905	\$ 43,183
IRON	\$ 326,149	\$ 14,684
ISABELLA	\$ 1,583,486	\$ 71,341
JACKSON	\$ 5,241,183	\$ 236,114
KALAMAZOO	\$ 6,983,406	\$ 314,598
KALKASKA	\$ 636,618	\$ 28,680

County	Overall Costs	Admin Costs
KENT	\$ 19,202,750	\$ 865,480
KEWEENAW	\$ 37,403	\$ 1,684
LAKE	\$ 652,330	\$ 29,365
LAPEER	\$ 2,068,136	\$ 93,200
LEELANAU	\$ 248,627	\$ 11,218
LENAWEE	\$ 2,603,712	\$ 117,315
LIVINGSTON	\$ 2,374,432	\$ 106,984
LUCE	\$ 178,435	\$ 8,035
MACKINAC	\$ 204,665	\$ 9,227
MACOMB	\$ 21,982,376	\$ 990,295
MANISTEE	\$ 774,598	\$ 34,896
MARQUETTE	\$ 1,230,609	\$ 55,434
MASON	\$ 940,320	\$ 42,358
MECOSTA	\$ 1,371,854	\$ 61,801
MENOMINEE	\$ 478,451	\$ 21,546
MIDLAND	\$ 2,021,141	\$ 91,032
MISSAUKEE	\$ 511,197	\$ 23,033
MONROE	\$ 3,644,208	\$ 164,183
MONTCALM	\$ 2,364,184	\$ 106,515
MONTMORENCY	\$ 352,761	\$ 15,879
MUSKEGON	\$ 7,592,815	\$ 342,055
NEWAYGO	\$ 1,979,193	\$ 89,157
OAKLAND	\$ 23,884,713	\$ 1,075,912
OCEANA	\$ 984,046	\$ 44,376
OGEMAW	\$ 916,715	\$ 41,273
ONTONAGON	\$ 126,812	\$ 5,702
OSCEOLA	\$ 955,862	\$ 43,055
OSCODA	\$ 384,125	\$ 17,296
OTSEGO	\$ 875,647	\$ 39,451
OTTAWA	\$ 4,609,486	\$ 207,760
PRESQUE ISLE	\$ 376,191	\$ 16,936
ROSCOMMON	\$ 994,015	\$ 44,747
SAGINAW	\$ 9,065,351	\$ 408,318
SAINT CLAIR	\$ 4,938,496	\$ 222,503
SAINT JOSEPH	\$ 1,937,948	\$ 87,355
SANILAC	\$ 1,306,891	\$ 58,879
SCHOOLCRAFT	\$ 234,668	\$ 10,567
SHIAWASSEE	\$ 2,142,279	\$ 96,529
TUSCOLA	\$ 1,786,667	\$ 80,481
VAN BUREN	\$ 2,553,668	\$ 115,050
WASHTENAW	\$ 6,554,162	\$ 295,287

County	Overall Costs	Admin Costs
WAYNE	\$ 79,537,152	\$ 3,583,307
WEXFORD	\$ 1,358,466	\$ 61,201
Grand Total	\$ 304,980,777	\$ 13,739,993

Table 4: FY22 Costs by County⁷

County	Overall Costs	Admin Costs
ALCONA	\$ 107,123	\$ 4,807
ALGER	\$ 53,473	\$ 2,398
ALLEGAN	\$ 925,866	\$ 41,553
ALPENA	\$ 331,376	\$ 14,873
ANTRIM	\$ 187,283	\$ 8,401
ARENAC	\$ 168,700	\$ 7,570
BARAGA	\$ 53,646	\$ 2,411
BARRY	\$ 372,196	\$ 16,696
BAY	\$ 1,037,569	\$ 46,559
BENZIE	\$ 135,377	\$ 6,073
BERRIEN	\$ 1,448,465	\$ 64,960
BRANCH	\$ 401,120	\$ 17,990
CALHOUN	\$ 1,489,845	\$ 66,833
CASS	\$ 427,747	\$ 19,183
CHARLEVOIX	\$ 178,800	\$ 8,025
CHEBOYGAN	\$ 270,201	\$ 12,125
CHIPPEWA	\$ 231,517	\$ 10,404
CLARE	\$ 414,359	\$ 18,591
CLINTON	\$ 373,364	\$ 16,752
CRAWFORD	\$ 166,743	\$ 7,483
DELTA	\$ 273,789	\$ 12,281
DICKINSON	\$ 172,171	\$ 7,721
EATON	\$ 730,777	\$ 32,786
EMMET	\$ 208,596	\$ 9,362
GENESEE	\$ 5,882,091	\$ 263,971
GLADWIN	\$ 275,111	\$ 12,344
GOGEBIC	\$ 133,702	\$ 5,997
GRAND TRAVERSE	\$ 599,467	\$ 26,900
GRATIOT	\$ 390,897	\$ 17,541
HILLSDALE	\$ 491,805	\$ 22,068
HOUGHTON	\$ 212,085	\$ 9,506
HURON	\$ 255,338	\$ 11,455

County	Overall Costs	Admin Costs
INGHAM	\$ 2,628,570	\$ 117,943
IONIA	\$ 522,058	\$ 23,428
IOSCO	\$ 291,230	\$ 13,066
IRON	\$ 96,924	\$ 4,345
ISABELLA	\$ 495,341	\$ 22,225
JACKSON	\$ 1,587,540	\$ 71,236
KALAMAZOO	\$ 2,121,176	\$ 95,172
KALKASKA	\$ 197,561	\$ 8,864
KENT	\$ 5,902,506	\$ 264,925
KEWEENAW	\$ 10,743	\$ 481
LAKE	\$ 199,642	\$ 8,961
LAPEER	\$ 625,728	\$ 28,074
LEELANAU	\$ 73,987	\$ 3,321
LENAWEE	\$ 783,701	\$ 35,159
LIVINGSTON	\$ 725,281	\$ 32,541
LUCE	\$ 54,779	\$ 2,458
MACKINAC	\$ 60,509	\$ 2,720
MACOMB	\$ 6,617,588	\$ 296,753
MANISTEE	\$ 235,204	\$ 10,555
MARQUETTE	\$ 361,946	\$ 16,234
MASON	\$ 290,259	\$ 13,025
MECOSTA	\$ 422,532	\$ 18,967
MENOMINEE	\$ 141,547	\$ 6,349
MIDLAND	\$ 616,956	\$ 27,681
MISSAUKEE	\$ 155,047	\$ 6,956
MONROE	\$ 1,110,695	\$ 49,829
MONTCALM	\$ 729,934	\$ 32,762
MONTMORENCY	\$ 105,141	\$ 4,718
MUSKEGON	\$ 2,319,417	\$ 104,101
NEWAYGO	\$ 607,434	\$ 27,263
OAKLAND	\$ 7,325,860	\$ 328,790
OCEANA	\$ 299,688	\$ 13,449
OGEMAW	\$ 271,894	\$ 12,199
ONTONAGON	\$ 36,833	\$ 1,651
OSCEOLA	\$ 297,028	\$ 13,332
OSCODA	\$ 118,526	\$ 5,319
OTSEGO	\$ 265,493	\$ 11,914
OTTAWA	\$ 1,441,035	\$ 64,679

County	Overall Costs	Admin Costs
PRESQUE ISLE	\$ 112,464	\$ 5,047
ROSCOMMON	\$ 303,425	\$ 13,614
SAGINAW	\$ 2,763,323	\$ 124,040
SAINT CLAIR	\$ 1,485,403	\$ 66,649
SAINT JOSEPH	\$ 584,163	\$ 26,199
SANILAC	\$ 401,607	\$ 18,020
SCHOOLCRAFT	\$ 69,796	\$ 3,131
SHIAWASSEE	\$ 647,670	\$ 29,064
TUSCOLA	\$ 545,299	\$ 24,470
VAN BUREN	\$ 767,744	\$ 34,434
WASHTENAW	\$ 2,024,121	\$ 90,851
WAYNE	\$ 23,818,824	\$ 1,068,187
WEXFORD	\$ 411,060	\$ 18,444
Grand Total	\$ 92,482,826	\$ 4,149,214

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